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# DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION **ACTIVITY REPORT: On-site Inspection**

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FACILITY: SUPERIOR MATERIALS LLC		SRN / ID: B8763
LOCATION: 8911 W. JEFFERSON, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Tom Peters , Area Manager		ACTIVITY DATE: 08/26/2020
STAFF: Gerald Krawiec	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection for FY20		
RESOLVED COMPLAINTS:		

## AQD inspection Augst 26, 2020

AQD staff conducted a Scheduled Inspection for FY 2020 of Superior Materials Plant #32, is located at 8911 West Jefferson Avenue in the City of Detroit. The purpose of the inspection was to determine the facility's compliance with applicable state and federal air pollution rules and regulations, and AQD's PTI 138-18. Area Manager, Tom Peters accompanied AQD staff during this inspection.

#### BACKGROUND:

Since 1989 there has been a Ready-Mix Concrete plant at this location. The facility is located on a 9.79-acre parcel of land. Located on Jefferson between Dearborn Street and the Rouge River. Wayne County Permits No. C-8331 was issued to Clawson Concrete Company for this plant on May 17, 1989.

In the year 2000, Superior Materials purchased and continued the operation of this facility designating it Plant #32. In August 2018, Superior Materials applied for a PTI and on October 17, 2018, was issued an Operating Program (PTI No. 138-18). The purpose of this PTI is to describe the tools and methods used to control fugitive dust emissions in accordance with Section 5524 of the Natural Resources and Environmental Protection Act, being MCL 324.5524, Fugitive dust sources or emissions.

This facility was last inspected by AQD on May 21, 2014. At that time, it was determined to be operating in compliance. There is no history of citizen complaints.

#### PROCESS DESCRPITION:

This facility has an Erie Strayer Co, Model No. MCG11C, 12 cubic yard central mix concrete plant with a maximum production rate of 480 tons per hour (TPH), equipped with a two-compartment 9600 CFM baghouse. A central mix facility combines water, cement, sand, and coarse aggregate to make concrete. Sand and coarse aggregate are delivered by boat. Both are stored in open stockpiles and loaded by front end loader into two 25-ton loading hoppers and then conveyed to elevated bins. Cement is delivered by bulk truck and transferred to an elevated 400-ton storage silo pneumatically. Emissions from this silo are directed to the central baghouse. From these elevated bins, the constituents are fed by gravity to weigh hoppers, which combine the proper amounts of each material. Emissions from the weigh hoppers are directed to the central baghouse. The material is transferred to a central mixer where water and other add-mixtures are combined. The transfer from the weigh hoppers to the central mixer is within the plant building structure. The mix is then transferred to an agitator truck for transport to the job site.

### **OPERATING SCHEDULE:**

This plant has 32 employes, including 25 drivers. The plant operates 6 days per week and up to 12 hours per day. The plant is classified as a permanent plant and can operate 52 week a year.

## **INSPECTION NARATIVE:**

AQD staff has conducted surveillance on many occasions while in this area conducting inspections of nearby sources. Visible emissions have not been observed. However, on occasion track-out from the transit mixer trucks onto Jefferson has been observed. A phone call Tom Peters always resulted in a street sweeper cleaning the roadway.

I contacted the Area Manager, Tom Peters and scheduled this inspection for August 26, 2020. I also made a request of Mr. Peters, to make copies of the 2019 and 2020 concrete production records, air permit required compliance and maintenance logs, and fugitive dust control logs. I wanted copies that I can take with me to review off-site. Having copies that I can take with me to review minimizes the person-to-person time spent at the plant during this current time of Covid-19 health concerns.

AQD staff and Tom Peters toured inside the plant observing operations and the conditions of the baghouses and other operating equipment. The ductwork was all in good condition, no leaks. After the indoor inspection, we drove around the site in Tom's truck. At the time of this inspection, the sprinklers (garden type) were in use wetting the sand and aggregate piles located in bins along Jefferson. The paved roadways have been swept and unpaved roadways had been treated. There was no dirt tracked out onto Jefferson, this had been observed occasionally in the past.

This facility also has the City of Detroit required license regarding piles and fugitive dust. Two City of Detroit inspectors conducted an inspection of the site a few weeks ago, no problems were identified.

#### POST INSPECTION:

Upon closing this inspection, I thanked Mr. Peters for making copies of the records available. I stated that I will be reviewing the company records off-site. If I have any questions or issues, I will be in contact with him.

### **OFF-SITE RECORDS REVIEW:**

The concrete production records were reviewed for January – December 2019 and the total production was 161,969 cubic yards. Copies are attached and demonstrate compliance. The concrete production records were reviewed for January – July 2020 and production is 71,248 cubic yards. Copies demonstrate compliance and are attached.

Records of yard sweeping, dust suppressant application, and stockpile watering for the past 12-months through August 2020 demonstrate compliance (random samples attached).

Records of source-wide Fugitive Dust and sediment track-out routine inspections for the past 12-months through August 2020 demonstrate compliance (random samples attached).

### **EMISSIONS:**

Potential emissions from the storage and handling of aggregate materials and dust emissions from paved and unpaved roads were calculated by the company. Per AQD's PTI 138-18, the particulate emissions were below major source thresholds. The PTE for controlled PM10 emissions is calculated to be 3.76 tpy based on a material throughput of 200,000 cubic yards per year. The material throughput for the year 2019 was 161,969 cubic yards, and for the year 2020 from January - August is 71,248 cubic yards.

### **COMPLIANCE DETERMINATION:**

Based on this plant inspection and the review of the conditions of Superior Materials Operating Program (PTI No. 138-18). Superior Materials Plant #32 aka; the Jefferson Plant is operating in compliance with applicable air quality rules and regulations.

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